

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re Andri L Council, Jr.

Debtor

Case No. 22-10464/elf

Chapter 13

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF  
AUTOMATIC STAY UNDER SECTION 362 OF  
U.S. BANK NATIONAL ASSOCIATION  
TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY ET AL**

1. Admitted.

2. Admitted.

3. Denied. The averments in this paragraph are legal conclusions to which no response is required and they are therefore deemed denied.

4. Admitted.

5. Admitted.

6. Admitted in part, denied in part. It is admitted that Debtor has missed some of his post-petition mortgage payments, but it is denied that he has missed all the payments from March 2022 through August 2022.

7. Denied. The averments in this paragraph are legal conclusions to which no response is required and they are therefore deemed denied.

8. Denied. It is specifically denied that Debtor owes \$5,035.32 in post-petition mortgage payments, fees and costs.

9. Denied. The averments in this paragraph are legal conclusions to which no response is required and they are therefore deemed denied.

10. Denied. The averments in this paragraph are legal conclusions to which no response is required and they are therefore deemed denied.

WHEREFORE, Debtor requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay .

**/s/Bradly E. Allen**

**Bradly E. Allen, Esquire  
Attorney for Debtor**

**United States Bankruptcy Court  
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**ORDER**

AND NOW, this the                      day of                      , 2022 upon Motion of U.S. Bank National Association, et al for Relief from the Automatic Stay and Debtor's Response it is hereby;  
ORDERED that the Motion for Relief of U.S. Bank National Association et al is denied.

Dated: \_\_\_\_\_

BY THE COURT:

\_\_\_\_\_  
**HONORABLE ERIC L. FRANK**  
**United States Bankruptcy Judge**